

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

STATON TECHIYA, LLC and SYNERGY
IP CORPORATION,

Plaintiffs-Counterclaim Defendants,

V.

SAMSUNG ELECTRONICS CO. LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.

Defendants-Counterclaim Plaintiffs.

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Case Nos. 2:21-CV-00413-JRG-RSP;
2:22-cv-00053-JRG-RSP

STATON TECHIYA, LLC'S BENCH TRIAL WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court’s February 27, 2024 Order (Dkt. 843), Staton Techiya, LLC (“Techiya”) respectfully submits the following list of percipient and expert witnesses whom it expects to call at the bench trial as well as those whom it may call at the bench trial if the need arises, any of whom may be presented in person, through the use of deposition designations or videotaped deposition, or as otherwise permitted.

Techiya submits this witness list without waiving any rights, including the right to supplement or amend the witness list as necessary. In addition to the witnesses listed below, Techiya reserves the right to call, in person or by deposition, any witnesses identified on any other party's witness list, as well as any witnesses necessary to offer rebuttal evidence. By identifying the witnesses below, Techiya does not waive any right to object to another party's presentation of those same witnesses, does not waive any objections to the admissibility of any witness's testimony, and does not waive its right to move to exclude any witness's testimony.

I. Techiya's Witness List

Witness	Will Call Live	May Call Live	May Call by Deposition
Suengho Ahn		X	X
Jerry Bui ¹		X	
Hojin Chang ²		X	X
Sungil Cho		X	X
Claude Ducloux		X	
Brian Firestone		X	
Michelle Fisher ³		X	X
Ben Goodman ⁴		X	X
Stephen Holzen		X	
John Patrick Keady	X		
Yooseok Kim ²		X	X
Injung Lee ²		X	
Jae Seong Lee			X
Samsung Corporate Representative		X	
Yasmin Seyal		X	X
Daniel Staton		X	
John Usher		X	X
Raymond J. Warren		X	

¹ Techiya intends to present testimony from Mr. Bui only if the Court allows Samsung to present testimony from Mr. Cowen. *See infra* at 3; Dkt. 743 at 2.

² Only to the extent that the Court allows Samsung to reopen discovery and obtain additional depositions before the bench trial of witnesses who previously have been deposed in this matter, Techiya reserves the right to seek supplemental pretrial depositions of Hojin Chang, Injung Lee, and Yooseok Kim.

³ And/or another representative or records custodian as may be designated by Blaze Mobile, Inc. for trial.

⁴ And/or another representative or records custodian as may be designated by Strong Force Design LLC (S4S) for trial.

II. Techiya's Objections to Samsung's Witness List

Techiya submits the following objections to Samsung's identification of certain witnesses on its February 29, 2024 Bench Trial Witness List (Dkt. 848).

Techiya objects to the identification of any witness who: (i) was not disclosed as part of Samsung's initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1); (ii) was not made available for deposition during fact discovery or under reasonable procedures consistent with the Federal Rules of Civil Procedure; or (iii) was not identified on Samsung's previously disclosed witness list (Dkt. 642, Ex. D). Should the Court permit any such witness to testify at trial—including but not limited to Yunhee Kang, Jongmin Lee, Sunghyuk Lim, and Sukki Yoon—Techiya reserves the right to take that witness's deposition in the United States a reasonable amount of time prior to trial, as determined by the Court, in a manner consistent with Federal Rule of Civil Procedure 30.

Techiya further objects to the proffered testimony of David Cabello and David Cowen, whose testimony and reports are each subject to pending motions to exclude and strike. *See* Dkts. 422, 747.

Additionally, Techiya objects to Samsung's identification of David Cowen on its Bench Trial Witness List. Mr. Cowen's opinions and the relief sought by Samsung's Motion for Sanctions (Dkt. 650)—for which the Court granted Samsung leave to submit Mr. Cowen's belatedly produced expert report and testimony—are limited solely to Samsung's claims against Synergy, Ahn, and Cho, which claims were severed from the above-captioned actions. *See* Dkt. 840.

Techiya further objects to Samsung's identification of a Korean Translator on its witness list to the extent Samsung intends to call any Korean Translator, who has not been identified, as a fact witness in this case.

Techiya has previously provided its objections to Samsung's designated deposition testimony and exhibits.

Techiya reserves all rights to object to and seek to exclude testimony, exhibits, and/or demonstratives offered by any witnesses identified by Samsung.

Techiya further reserves the right to supplement this witness list to the extent it becomes necessary as a result of any supplemental productions made by Synergy or Samsung, including without limitation the production of unredacted documents pursuant to the Court's February 28, 2024 Order (Dkt. 844).

Dated: March 1, 2024

Respectfully submitted,

By: /s/ Melissa C. Pallett-Vasquez
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CERTIFICATE OF SERVICE

I certify that on March 1, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

By: /s/ Melissa C. Pallett-Vasquez
Melissa C. Pallett-Vasquez